

CLARK NEWBERRY LAW FIRM  
Tara Clark Newberry, Esq. (SBN: 10696)  
tnewberry@cnlawlv.com  
7854 West Sahara Avenue  
Las Vegas, NV 89117  
Telephone: (702) 608-4232  
Facsimile: (702) 946-1380  
*Attorney for Collegium Fund LLC Series 32*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

COLLEGIUM FUND SERIES 32, a Nevada  
Limited Liability Company,

Plaintiff,

vs.

MARK DANIEL SNYDER, an individual;  
WELLS FARGO BANK, N.A.; DOES I  
through X; and ROE CORPORATIONS 1  
through 10,

Defendants,

WELLS FARGO BANK, N.A., a national  
banking association, and FEDERAL HOME  
LOAN MORTGAGE CORPORATION,

Counter-Claimants,

vs.

COLLEGIUM FUND SERIES 32, a Nevada  
limited-liability company; ABSOLUTE  
COLLECTION SERVICES, LLC, a Nevada  
limited liability company; NUEVO VISTA  
HOMEOWNERS ASSOCIATION, INC., a  
Nevada non-profit cooperative corporation;

Counter-Defendant.

CASE NO.: 2:16-CV-01640-JCM-PAL

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF  
COLLEGIUM FUND LLC SERIES  
32 TO RESPOND TO FREDDIE  
MAC AND WELLS FARGO'S  
MOTION FOR  
RECONSIDERATION OF ORDER  
DENYING THEIR MOTION FOR  
SUMMARY JUDGMENT [ECF NO.  
56]**

**(FIRST REQUEST)**

**STIPULATION**

The parties, by and through their respective counsel of record, hereby stipulate and request that this Court enter an order, pursuant to Local Rules 6-1 and 7-1, to extend the time for Plaintiff/Counter-Defendant, COLLEGIUM FUND LLC SERIES 32 (“Collegium #32”), to respond to the “Motion for Reconsideration of Order Denying Their Motion for Summary Judgment [ECF No. 56]” (“MFR”) filed by Counterclaimant, FEDERAL HOME LOAN MORTGAGE CORPORATION (“Freddie Mac”) and Defendant, WELLS FARGO BANK, N.A. (“Wells’ Fargo”) on August 2, 2017 as Doc. No. 57. Responses are currently due on August 16, 2017. The parties have agreed to extend the time to file responses to September 1, 2017. Additionally, the parties have agreed that the reply to the response shall be due on or before September 29, 2017.

This is the first request and stipulation to respond to the motion to reconsider this Court’s order denying Freddie Mac and Wells Fargo’s Motion for Summary Judgment. The stipulation and order are necessary to complete the briefing on the complex issues raised and revisited in the MFR. The summer calendar of Collegium #32’s counsel also conflicts with preparing a timely response to the MFR. This request is made in good faith and not submitted for any improper purpose or delay.

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1 It is so stipulated by the parties that the time to respond to the MFR will be extended from  
2 August 16, 2017 to September 1, 2017. It is also stipulated by the parties that the reply to the  
3 response shall be due on or before September 29, 2017.  
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5 CLARK NEWBERRY LAW FIRM

SNELL & WILMER L.L.P.

6  
7 By: /s/ Tara Clark Newberry

By: /s/ Nathan G. Kanute

8 Tara Clark Newberry, Esq.

Nathan G. Kanute, Esq.

9 Nevada Bar No. 10696

Nevada Bar No. 1241350 West Liberty  
Street, Suite 510

10 7854 W. Sahara Avenue

Reno, Nevada 89501-1961

11 Las Vegas, NV 89117

Attorneys for

Attorneys for Wells Fargo Bank, N.A. and  
Federal Home Loan Mortgage Corporation

Collegium Fund LLC Series 32

12 DATED: August 14, 2017

DATED: August 14, 2017

13 ABSOLUTE COLLECTION SERVICES,  
LLC

PENGILLY LAW FIRM

14 By: /s/ Shane D. Cox

By: /s/ Elizabeth B. Lowell

15 Shane D. Cox, Esq.

Elizabeth B. Lowell, Esq.

16 Nevada Bar No. 13852

Nevada Bar No. 8551

17 8440 W. Lake Mead Blvd., Ste. 210

David Markman, Esq.

Las Vegas, NV 89128

Nevada Bar No. 12440

Attorneys for Absolute Collection Services

1995 Village Center Circle, Ste. 190

Las Vegas, NV 89134

18 DATED: August 14, 2017

Attorneys for Nuevo Vista HOA

19 DATED: August 14, 2017

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22 IT IS SO ORDERED August 17, 2017.

23   
24 UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15<sup>th</sup> day of August 2017, I electronically submitted the foregoing **STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF COLLEGIUM FUND LLC SERIES 32 TO RESPOND TO FREDDIE MAC AND WELLS FARGO'S MOTION FOR RECONSIDERATION OF ORDER DENYING THEIR MOTION FOR SUMMARY JUDGMENT [ECF NO. 56] (FIRST REQUEST)** with the clerk of the court for the U.S. District Court, District of Nevada, using the electronic case file system of the court. The electronic case file system sent a "Notice of Electronic Filing" to the following individuals, who have consented in writing to accept this Notice as service of this document by electronic means.

Amy F. Sorenson asorenson@swlaw.com, Docket\_LAS@swlaw.com, smoen@swlaw.com  
DOCKET\_SLC@swlaw.com

Nathan Guy Kanute nkanute@swlaw.com, dcalhoun@swlaw.com, ljtaylor@swlaw.com

Craig S Denney craig.denney@ssa.gov

David A Markman dmarkman@pengillylawfirm.com, cschnider@pengillylawfirm.com,  
oschulze@pengillylawfirm.com, reception@pengillylawfirm.com

Elizabeth B Lowell elowell@pengillylawfirm.com

James W Pengilly jpengilly@pengillylawfirm.com

Shane D. Cox shane@absolute-collection.com

/s/ Kathleen Seckinger

Kathleen Seckinger, an Employee of  
CLARK NEWBERRY LAW FIRM